



April 22, 2003

Ms. Sandra Haberlin
OUSD (AT&L) DPAP (DAR)
IMD 3C132
3062 Defense Pentagon
Washington, DC 20301-3062

Ref: DFARS Case Number 2002-D001

Dear Ms. Haberlin:

The Aerospace Industries Association (AIA) is pleased to submit its comments on the interim rule to the Defense Federal Acquisition Regulation Supplement (DFARS) that implements a statutory requirement for contractors to submit, and for DoD to process, payment requests in electronic form.

AIA represents the nation's major manufacturers of commercial, military and business aircraft, helicopters, aircraft engines, missiles, spacecraft, materiels, and related components and equipment. As of April 16, 2003 AIA has seventy-three member companies and 139 Associate member companies.

We fully support the initiative to require submission and processing of all DoD contract payment requests electronically. Clearly, the effective implementation of the requirement will result in significant benefits (e.g., major cost savings) to the DoD and its contractors. However, we are concerned that issues raised in the CODSIA response to the proposed rule (published 5/31/02) have not been adequately addressed in drafting the interim rule. We are also concerned about the absence of a comprehensive implementation plan that clearly lists requirements contractors must meet and specifies the circumstances that will result in exceptions to the requirement for electronic submission and processing.

When the Interim Rule was issued on February 21, 2003, an electronic submission solution for all invoice types and for all DOD payment systems was not available. Because of the significant programming and testing efforts necessary to convert to a new process, a reasonable transition period must be provided to contractors when a previously unavailable electronic solution for a particular invoice type (e.g., performance based payments) becomes available. AIA proposes the establishment of a six-month grace period during which paper invoices continue to be accepted after a new electronic submission option has been added. Further, we recommend that all options for electronic submission include both an FTP or EDI batch solution

to accommodate contractors that have high transaction counts and a simple web solution for contractors with low transaction counts.

To avoid confusion over the requirements placed on contractors, DoD should establish and maintain a detailed schedule of electronic solutions available. The schedule should list available solutions by invoice type, payment system, and payment office. (See attached draft matrix.) The schedule should also show all system limitations (e.g., paper final vouchers), invoice types for which paper submission is acceptable, and the date(s) when compliance with electronic submission for newly deployed solutions is required.

To avoid confusion at the payment offices, we recommend that detailed guidance and training be provided to all DoD payment staff regarding the payment request types for which paper invoicing is permitted. It is very important to ensure that the process for obtaining authorization for the use of paper invoices, when justified, is administratively simple and clearly communicated to the payment office. To simplify the process of obtaining authorization for the use of paper, general categories of exceptions (e.g., contracts awarded prior to 3/1/03, invoice types where no electronic commerce solution is available, invoices allowed during grace periods, etc.) should be identified and communicated by DoD to its contracting officers, payment offices, and contractors. The dissemination to all parties of general exception categories will eliminate the requirement for contractors to obtain contracting officer approval for the use of paper when an electronic solution is not available. Also, DoD guidelines should specify that contractors should include a notation on paper invoices if the contractor believes an approved general exception applies, or if a prior agreement with the contracting officer and payment office applies.

Also, in the DoD's development of long term plans to migrate to one common electronic commerce system (i.e., Wide Area Work Flow), existing electronic commerce solutions permitted by statute (i.e., Web Invoicing System and Electronic Data Interchange) should be remapped into the specification required by the common system rather than requiring contractors to incur the significant cost of remapping. Once a decision has been made by DoD to retire an electronic option permitted by statute, contractors should be notified of the decision and be provided at least six months to migrate. The migration to Wide Area Work Flow should occur only after the deployment (utilizing methods permitted by statute) of electronic invoicing solutions for all invoice types and payment systems.

Section 242.246-7000 (b) of the Interim Rule states that contractors can meet the requirement for submission of a material inspection and receiving report using the Wide Area Workflow - Receipt and Acceptance electronic form. Industry supports this approach. Consistent with the Public Law, paragraph (b) does not make submission of such reports electronically a requirement. Industry will continue to work with DoD to make the submission of receiving reports electronically a reality, but DoD should not add this requirement to the

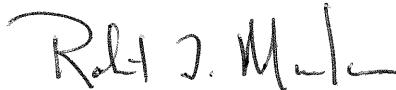
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DFARS until the functionality of WAWF is fully developed and all DoD officials responsible for approving receiving reports are fully trained in the operation of the system. If DoD ever considers modifying the DFARS to add this requirement, industry recommends that DoD issue another proposed rule first.

Finally, we believe that before DoD finalizes policies and procedures for implementing the statutory requirement, it would be beneficial to both DoD and its contractors for DoD to schedule a public meeting to discuss this matter. The objective of the meeting should be to develop an implementation plan acceptable to all parties, paying particular attention to the procedures to be followed to accommodate exceptions.

If you have any questions concerning any of the above-mentioned statements, please contact Mr. Dick Powers of my staff on 703 358-1042. Dick's email address is powers@aia-aerospace.org.

Sincerely,



Robert T. Marlow
Vice President, Government Division

Attachment

DOD Electronic Invoice Solution Availability Matrix

(Draft Format - Information is incomplete at this time)

Report Date 8-Apr-03

Payment System	Op Location	DODAAC	Invoice Type	Electronic Commerce Solution	Solution limitations (Samples - Not comprehensive at this time)	Use Required (a)
MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC, JNF, J,S, JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT,JWV)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Commercial/Fixed Price Invoice (No DOD Certification or approval required on the invoice)	WINS FTP batch input WAWF EDI	No transportation over \$189.99 No Multi ACRN lines, No transportation over \$189.99 Ship Shorts, No FMS, No Fast Pay, No Corrections.	3/1/2003 3/1/2003
				WAWF FTP batch input WAWF EDI	No Multi ACRN lines, No transportation over \$189.99, No Ship Shorts, No FMS, No Fast Pay, No Corrections.	3/1/2003
				WAWF Web input WAWF Web input	No Multi ACRN lines, No transportation over \$189.99, No Ship Shorts, No FMS, No Fast Pay, No Corrections.	3/1/2003
				EDI 810 EDI 810	Ship Shorts, No FMS, No Fast Pay, No Corrections. Permits Multi ACRN lines, etc..	3/1/2003
MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC, JNF, J,S, JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT,JWV)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Cost vouchers for contractors with approved direct submission status (No DOD Certification or approval required on the invoice)	WINS Web input WINS FTP batch input WAWF EDI	No first or final vouchers. No transportation over \$189.99 No first or final vouchers. No transportation over \$189.99 First and finals permitted. No transportation over \$189.99 First and finals permitted. No transportation over \$189.99 First and finals permitted. No transportation over \$189.99 EDI 810 EDI 810	3/1/2003 3/1/2003 3/1/2003 3/1/2003 3/1/2003 3/1/2003
MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC, JNF, J,S, JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT,JWV)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Cost vouchers requiring DOD Certification or Approval on the invoice (No Direct Submit Authorization)	WAWF EDI WAWF FTP batch input WAWF Web input	First and finals permitted. No transportation over \$189.99 First and finals permitted. No transportation over \$189.99 First and finals permitted. No transportation over \$189.99 First and finals permitted. No transportation over \$189.99 First and finals permitted. No transportation over \$189.99 EDI 810 EDI 810	3/1/2003 3/1/2003 3/1/2003 3/1/2003 3/1/2003 3/1/2003
MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC, JNF, J,S, JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT,JWV)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Direct Submission Progress Payments (No DOD Certification or approval required on the invoice)	WINS Web input WINS FTP batch input	First and finals permitted. No transportation over \$189.99 First and finals permitted. No transportation over \$189.99 First and finals permitted. No transportation over \$189.99 First and finals permitted. No transportation over \$189.99 First and finals permitted. No transportation over \$189.99 EDI 810 EDI 810	3/1/2003 3/1/2003 3/1/2003 3/1/2003 3/1/2003 3/1/2003
MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC, JNF, J,S, JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT,JWV)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Progress Payments requiring DOD Certification or approval (ACO) on the invoice.	WINS Web input WINS FTP batch input	None available as of report date None available as of report date EDI 810 EDI 810	3/1/2003 3/1/2003 3/1/2003 3/1/2003
MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC, JNF, J,S, JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT,JWV)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Performance Based Payments	None available as of report date None available as of report date		
MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC, JNF, J,S, JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT,JWV)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Commercial Financing Request	None available as of report date None available as of report date		

DOD Electronic Invoice Solution Availability Matrix

(Draft Format - Information is incomplete at this time)

MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC ,JNF, J.S.,JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT, JWW)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Fixed Price Level of Effort	None available as of report date
MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC ,JNF, J.S.,JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT, JWW)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Time and Material	None available as of report date
MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC ,JNF, J.S.,JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT, JWW)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Invoices with contractual requirement for DOD Certification or approval on the invoice (SER, ACO, etc..)	None available as of report date
MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC ,JNF, J.S.,JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT, JWW)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Classified Invoices	None available as of report date
MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC ,JNF, J.S.,JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT, JWW)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Credit billings or vouchers	None available as of report date
MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC ,JNF, J.S.,JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT, JWW)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Invoices containing withholds	None available as of report date
MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC ,JNF, J.S.,JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT, JWW)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Withhold release billing	None available as of report date
MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC ,JNF, J.S.,JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT, JWW)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Alternate liquidation rate billing	None available as of report date
MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC ,JNF, J.S.,JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT, JWW)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Unit price change billing	None available as of report date
MOCAS (North, South, and West)	Columbus (DFAS-CO-JN ,JNB, JNC ,JNF, J.S.,JSC, JSD ,JSA, JW, JWA,JWB, JWD, JWT, JWW)	HQ0337, HQ0338, HQ0339, SC1016, SC1032, SC1018	Corrections / Replace billings	?????
SAMMS (Break-out by op location if all locations do not have the same solutions available)	Columbus (DFAS-CO-SECC, LSCAA, SECE, LSCAB), Richmond (DFAS-CO-SECG, LSCAC). Philadelphia (DFAS- CO-SEP1, LSCBA, SEPT, LSCBA, SEPMLSCBA)	Columbus: S33181, S33184. Richmond: S44073, Philadelphia: S36054, SC0100, SC0200	Commercial/Fixed Price Invoice (No DOD Certification or approval required on the invoice)	WINS Web input
SAMMS (Break-out by op location if all locations do not have the same solutions available)	Columbus (DFAS-CO-SECC, LSCAA, SECE, LSCAB), Richmond (DFAS-CO-SECG, LSCAC). Philadelphia (DFAS- CO-SEP1, LSCBA, SEPT, LSCBA, SEPMLSCBA)			WINS FTP batch input
				EDI 810
				WAWF (Only SS33184)
				Only list invoice type if pay system has some MOCAS (Break-out by op location if all locations do not have the same solutions available)

DOD Electronic Invoice Solution Availability Matrix

(Draft Format - Information is incomplete at this time)

SAMMS (Break-out by op location if all locations do not have the same solutions available)	Columbus (DFAS-CO-SECC, LSCAA, SECE, LSCAB). Richmond (DFAS-CO-SECC, LSCAC). Philadelphia (DFAS-CO-SEP1, LSCBA, SEPT, LSCBA, SEP1, LSCBA)	Columbus: S33181, S33184. Richmond: S44073, Philadelphia: S36054, SC0100, SC0200	Cost Vouchers	None available as of report date	Only list invoice type if pay system has some
SAMMS (Break-out by op location if all locations do not have the same solutions available)	Columbus (DFAS-CO-SECC, LSCAA, SECE, LSCAB). Richmond (DFAS-CO-SECC, LSCAC). Philadelphia (DFAS-CO-SEP1, LSCBA, SEPT, LSCBA, SEP1, LSCBA)	Columbus: S33181, S33184. Richmond: S44073, Philadelphia: S36054, SC0100, SC0200	Performance Based Payments	None available as of report date	Only list invoice type if pay system has some
SAMMS (Break-out by op location if all locations do not have the same solutions available)	Columbus (DFAS-CO-SECC, LSCAA, SECE, LSCAB). Richmond (DFAS-CO-SECC, LSCAC). Philadelphia (DFAS-CO-SEP1, LSCBA, SEPT, LSCBA, SEP1, LSCBA)	Columbus: S33181, S33184. Richmond: S44073, Philadelphia: S36054, SC0100, SC0200	Commercial Financing Request	None available as of report date	Only list invoice type if pay system has some
SAMMS (Break-out by op location if all locations do not have the same solutions available)	Columbus (DFAS-CO-SECC, LSCAA, SECE, LSCAB). Richmond (DFAS-CO-SECC, LSCAC). Philadelphia (DFAS-CO-SEP1, LSCBA, SEPT, LSCBA, SEP1, LSCBA)	Columbus: S33181, S33184. Richmond: S44073, Philadelphia: S36054, SC0100, SC0200	Fixed Price Level of Effort	None available as of report date	Only list invoice type if pay system has some
SAMMS (Break-out by op location if all locations do not have the same solutions available)	Columbus (DFAS-CO-SECC, LSCAA, SECE, LSCAB). Richmond (DFAS-CO-SECC, LSCAC). Philadelphia (DFAS-CO-SEP1, LSCBA, SEPT, LSCBA, SEP1, LSCBA)	Columbus: S33181, S33184. Richmond: S44073, Philadelphia: S36054, SC0100, SC0200	Time and Material	None available as of report date	Only list invoice type if pay system has some
SAMMS (Break-out by op location if all locations do not have the same solutions available)	Columbus (DFAS-CO-SECC, LSCAA, SECE, LSCAB). Richmond (DFAS-CO-SECC, LSCAC). Philadelphia (DFAS-CO-SEP1, LSCBA, SEPT, LSCBA, SEP1, LSCBA)	Columbus: S33181, S33184. Richmond: S44073, Philadelphia: S36054, SC0100, SC0200	Invoice with contractual requirement for DOD Certification or approval on the invoice	None available as of report date	Only list invoice type if pay system has some
SAMMS (Break-out by op location if all locations do not have the same solutions available)	Columbus (DFAS-CO-SECC, LSCAA, SECE, LSCAB). Richmond (DFAS-CO-SECC, LSCAC). Philadelphia (DFAS-CO-SEP1, LSCBA, SEPT, LSCBA, SEP1, LSCBA)	Columbus: S33181, S33184. Richmond: S44073, Philadelphia: S36054, SC0100, SC0200	Classified Invoices	None available as of report date	Only list invoice type if pay system has some
SAMMS (Break-out by op location if all locations do not have the same solutions available)	Columbus (DFAS-CO-SECC, LSCAA, SECE, LSCAB). Richmond (DFAS-CO-SECC, LSCAC). Philadelphia (DFAS-CO-SEP1, LSCBA, SEPT, LSCBA, SEP1, LSCBA)	Columbus: S33181, S33184. Richmond: S44073, Philadelphia: S36054, SC0100, SC0200	Credit billings or vouchers	None available as of report date	Only list invoice type if pay system has some
SAMMS (Break-out by op location if all locations do not have the same solutions available)	Columbus (DFAS-CO-SECC, LSCAA, SECE, LSCAB). Richmond (DFAS-CO-SECC, LSCAC). Philadelphia (DFAS-CO-SEP1, LSCBA, SEPT, LSCBA, SEP1, LSCBA)	Columbus: S33181, S33184. Richmond: S44073, Philadelphia: S36054, SC0100, SC0200	Invoices containing withhold	None available as of report date	Only list invoice type if pay system has some

DOD Electronic Invoice Solution Availability Matrix

(Draft Format - Information is incomplete at this time)

SAMMS (Break-out by op location if all locations do not have the same solutions available)	Columbus (DFAS-CO:-SECC, LSCAA, SECE, LSCAB). Richmond (DFAS-CO:-SECG, LSCAC). Philadelphia (DFAS-CO:-SEPI, LSCBA, SEPM, LSCBA)	Columbus: S33181, S33184. Richmond: S44073, Philadelphia: S36054, SC0100, SC0200	Withhold release billing	None available as of report date	Only list invoice type if pay system has some
SAMMS (Break-out by op location if all locations do not have the same solutions available)	Columbus (DFAS-CO:-SECC, LSCAA, SECE, LSCAB). Richmond (DFAS-CO:-SECG, LSCAC). Philadelphia (DFAS-CO:-SEPI, LSCBA, SEPT, LSCBA, SEPM, LSCBA)	Columbus: S33181, S33184. Richmond: S44073, Philadelphia: S36054, SC0100, SC0200	Alternate liquidation rate billing	None available as of report date	Only list invoice type if pay system has some
SAMMS (Break-out by op location if all locations do not have the same solutions available)	Columbus (DFAS-CO:-SECC, LSCAA, SECE, LSCAB). Richmond (DFAS-CO:-SECG, LSCAC). Philadelphia (DFAS-CO:-SEPI, LSCBA, SEPT, LSCBA, SEPM, LSCBA)	Columbus: S33181, S33184. Richmond: S44073, Philadelphia: S36054, SC0100, SC0200	Unit price change billing	None available as of report date	Only list invoice type if pay system has some
STARS (Break-out by op location if all locations do not have the same solutions available)	Honolulu (DFAS-PC), Pensacola (DFAS-PE), Charleston (DFAS-CH), Norfolk (DFAS-NO), Oakland (DFAS-OK), San Diego (DFAS SD)	Honolulu: N445924, Pensacola: N68566, Charleston: N68892, Norfolk: N45924, Oakland: N68994, San Diego: N68688	Commercial invoices	WINS	
STARS (Break-out by op location if all locations do not have the same solutions available)	Honolulu (DFAS-PC), Pensacola (DFAS-PE), Charleston (DFAS-CH), Norfolk (DFAS-NO), Oakland (DFAS-OK), San Diego (DFAS SD)	Honolulu: N445924, Pensacola: N68566, Charleston: N68892, Norfolk: N45924, Oakland: N68994, San Diego: N68688	Cost Vouchers	WINS	
STARS (Break-out by op location if all locations do not have the same solutions available)	Honolulu (DFAS-PC), Pensacola (DFAS-PE), Charleston (DFAS-CH), Norfolk (DFAS-NO), Oakland (DFAS-OK), San Diego (DFAS SD)	Honolulu: N445924, Pensacola: N68566, Charleston: N68892, Norfolk: N45924, Oakland: N68994, San Diego: N68688	Detail all invoice types paid by the payment system	WAWF	
CAPS (Break-out by op location if all locations do not have the same solutions available)	DFAS IN/DNCO/DFAS-IN, DFAS-IN (DFAS-LW), Lawton/Ft. Sill (DFAS-RO), Rock Island (DFAS-R), St Louis (DFAS-SL), Seaside (DFAS-SS), Lexington (DFAS-LE), Norfolk (DFAS-NO), Orlando (DFAS-OR), Kansas City (DFAS-KC), San Antonio (DFAS-SA), DFAS-COLUMBUS (DFAS-CO)	DFAS IN/DNCO (HQ0105), DFAS-IN (HQ0347), Lawton/Ft Sill (HQ0300), Rome (HQ0302), Rock Island (HQ0303), St Louis (HQ0304), Seaside (HQ0305), Lexington (HQ0335), Norfolk (HQ0348), Orlando (HQ0301), Kansas City (M67443), San Antonio (HQ0345), DFAS-COLUMBUS (HQ0131)	Commercial Invoice	WINS	
				WAWF (All DODAACs listed except HQ0105, HQ0348, HQ0345)	

DOD Electronic Invoice Solution Availability Matrix

(Draft Format - Information is incomplete at this time)

CAPS (Break-out by op location if all locations do not have the same solutions available)	DFAS IN/DNO (DFAS-IN/DNO), DFAS-IN (DFAS-IN), Lawton/Ft. Sill (DFAS-LW), Rome (DFAS-RO), Rock Island (DFAS-RI), St Louis (DFAS-SL), Seaside (DFAS-SS), Lexington (DFAS-LE), Norfolk (DFAS-NO), Orlando (DFAS-OR), Kansas City (DFAS-KC), San Antonio (DFAS-SA), COLUMBUS (DFAS-CO)	DFAS IN/DNO (HQ0105), DFAS-IN (HQ0347), Lawton/Ft. Sill (HQ0300), Rome (HQ0302), Rock Island (HQ0303), St Louis (HQ0304), Seaside (HQ0305), Lexington (HQ0335), Norfolk (HQ0348), Orlando (HQ0301), Kansas City (M67443), San Antonio (HQ0345), DFAS-COLUMBUS (HQ0131)	Detail all invoice types paid by the payment system	
IAPS (Break-out by op location if all locations do not have the same solutions available)	Dayton (DFAS-DY), Limestone (DFAS-L), Omaha (DFAS-OM), Orlando (DFAS-OR), Pacific (DFAS-PC), San Bernardino (DFAS-SB), Ramstein (DFAS-Europe), Osan (OSAN), San Antonio (DFAS-SA), Japan (DFAS-JN)	Dayton (F03000), Limestone (F67100), Omaha (F25700), Orlando (F62400), Pacific (F68300), San Bernardino (F72300), Ramstein (F78900), Osan (F77800), San Antonio (F60700), Japan (F68800)	Commercial Invoice WINS	
			WAWF (Only F03000, F25700, F62400, F68300) EDI 810	
IAPS (Break-out by op location if all locations do not have the same solutions available)	Dayton (DFAS-DY), Limestone (DFAS-L), Omaha (DFAS-OM), Orlando (DFAS-OR), Pacific (DFAS-PC), San Bernardino (DFAS-SB), Ramstein (DFAS-Europe), Osan (OSAN), San Antonio (DFAS-SA), Japan (DFAS-JN)	Dayton (F03000), Limestone (F67100), Omaha (F25700), Orlando (F62400), Pacific (F68300), San Bernardino (F72300), Ramstein (F78900), Osan (F77800), San Antonio (F60700), Japan (F68800)	Detail all invoice types paid by the payment system	
DISMS	Columbus (DFAS-CO-LSCBB)	Columbus (S33150)	Commercial Invoice WINS	
DISMS	Columbus (DFAS-CO-LSCBB)	Columbus (S33150)	Detail all invoice types paid by the payment system	
AVEDS	TBD	TBD	Detail all invoice types paid by the payment system	

Contractor Requirements:

- 1) For contracts awarded after 1 March 2003 invoices must be submitted in electronic format unless a solution is not available, a limitation noted above applies, or the contracting officer authorizes an exception.
- 2) Electronic submission of invoices related to contracts awarded prior to 1 March 2003 is options
- 3) When paper invoices related to contracts awarded after 1 March 2003 are submitted the following comment should be stamped or written in large letters (Contractor Certifies Paper Invoice Authorized on the first page of the invoice)
 - a) Use required unless authorized exception (per contract, ACO, or limitations noted above)